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(Pro Hac Vice Application pending)
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Attorneys for Plaintiffs ASTERO, LLC, a New Jersey Limited Liability Company, and ANDREA K. TANTAROS, an individual

**THE UNITED STATES DISTRICT COURT,
FOR THE DISTRICT OF NEW JERSEY**

ASTERO, LLC, a New Jersey Limited
Liability Company; ANDREA K.
TANTAROS, an individual,

Plaintiffs,

VS.

TALK RADIO NETWORK
ENTERTAINMENT, INC., an Oregon
corporation, MARK MASTERS, an
individual, and Does 1 through 10,
inclusive.

Defendants.

Case No.: 1:13-cv-06005-NLH-JS

**APPLICATION OF PLAINTIFFS
ASTERO, LLC, A NEW JERSEY
LIMITED LIABILITY COMPANY,
AND ANDREA K. TANTAROS, AN
INDIVIDUAL, FOR CLERK'S
ENTRY OF DEFAULT AGAINST
DEFENDANTS TALK RADIO
NETWORK ENTERTAINMENT,
INC., AN OREGON
CORPORATION, AND MARK
MASTERS, AN INDIVIDUAL, IN
ACCORDANCE WITH
FED.R.CIV.P. 55(a)**

REQUEST FOR CLERK'S ENTRY OF DEFAULT

2 In accordance with Fed.R.Civ.P. 55(a), Plaintiffs ASTERO LLC, a New Jersey
3 Limited Liability Company, and ANDREA K. TANTAROS, an individual, requests
4 that a Clerk's Entry of Default be entered against Defendants TALK RADIO
5 NETWORK ENTERTAINMENT, INC., an Oregon Corporation (hereinafter "TRN"),
6 and MARK MASTERS, an individual (hereinafter "MASTERS"), for failure to plead or
7 otherwise defend. Defendants have not complied with the Summons issued on
8 November 8, 2013, by failing to appear or otherwise respond to the complaint within
9 the twenty-one day time frame prescribed in therein [Dkt. No. 12.] after being properly
10 served with the summons and Second Amended Complaint on November 21, 2013.
11 [Dkt. No. 14.]

AFFIDAVIT

13 1. The Summons and Complaint were served on both Defendants on or about
14 November 21, 2013, evidenced by the Proofs of Service of Summons on file with this
15 Court. [Dkt. No. 14.]

16 2. Defendants TRN and MASTERS have failed to plead or otherwise defend
17 in accordance with Fed.R.Civ.P. 12.

18 3. Defendants TRN and MASTERS are not infants, incompetent persons, or
19 members of the military service.

20 || 4. This statement is true and is signed under penalty of perjury.

21 | Dated: January 16, 2013

Respectfully submitted,

**Timothy J. McIlwain Attorney at Law
Christian S. Molnar Law Corporation**

/s/ Timothy J. McIlwain

Timothy J. McIlwain
Christian S. Molnar, Esq.,
attorneys for Plaintiffs ASTERO, LLC, a New
Jersey Limited Liability Company, and
ANDREA K. TANTAROS, an individual

PROOF OF SERVICE

I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, District of New Jersey, using the electronic case filing system of the court.

I hereby certify that on January 16, 2014, I caused:

**APPLICATION OF PLAINTIFFS ASTERO, LLC, A NEW JERSEY LIMITED
LIABILITY COMPANY, AND ANDREA K. TANTAROS, AN INDIVIDUAL,
FOR CLERK'S ENTRY OF DEFAULT AGAINST DEFENDANTS TALK
RADIO NETWORK ENTERTAINMENT, INC., AN OREGON CORPORATION,
AND MARK MASTERS, AN INDIVIDUAL, IN ACCORDANCE WITH
FED.R.CIV.P. 55(a)**

to be served by first class mail on:

Defendant TALK RADIO NETWORK, INC., an Oregon Corporation 225 NE Hillcrest Drive Grants Pass, OR 97526	Defendant MARK MASTERS, an individual 225 Hillcrest Drive Grants Pass, OR 97526
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FEDERAL: I declare, under penalty of perjury under the laws of the United States that the foregoing is true and that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

Executed on January 16, 2014, in Los Angeles, California.

/s/ Christina P. Farno
Christina P. Farno